Affidavit of Matthew Murrow, United States Postal Inspector

- I, Matthew Murrow, being first duly sworn on oath, state as follows:
- 1. I am a U. S. Postal Inspector with the U. S. Postal Inspection Service (USPIS), and have been so employed since April 2008. Prior to that, I was a police officer for thirteen years and was involved in numerous investigations, including narcotics investigations. I am currently assigned to the Springfield, Missouri, Domicile of USPIS and have experience enforcing federal mail and drug laws. This affidavit is based on my own personal knowledge and information given to me by other Postal Inspectors and other law enforcement personnel.
- 2. I received basic training for approximately twelve weeks from USPIS regarding individuals using the U.S. Mail to transport controlled substances and proceeds from the sale of controlled substances, as well as the use of Postal Money Orders to launder the proceeds of controlled substances. I received formal training for one week in September 2011 when I attended the USPIS Narcotics training course in Potomac, Maryland. This training involved narcotic investigation techniques, chemical field testing, and training in the identification and detection of controlled substances and narcotic proceeds being transported in the U.S. Mail and other commercial carriers. As a U.S. Postal Inspector, I have been involved in numerous narcotics investigations involving the U.S. Mail.
- 3. This affidavit is made in support of an application for a search warrant for United States Postal Service (USPS) Priority Mail parcel 9505513189418309038626. The parcel displays two, hand written, address labels and is addressed to "Mikel Mason, 1001 Nouth 23 AVE, OZARK Mo, 65721." One of the labels shows a return address of "PAPA BRAdfoRd, 2309 MessiNA AVE, PALeRMO, CA 95968," and the other label shows the mailer as "Papa BeAdfoRd" at the same

address. The parcel was mailed on November 5, 2018, from Palermo, CA 95968. Further, this parcel weighs approximately eight pounds, two ounces, measures approximately 20.5" x 16.5" x 8.5", and bears \$43.35 in postage. It is wrapped in red, Christmas wrapping paper and has a red bow (hereinafter **Subject Parcel**). A photo of the Subject Parcel is included as ATTACHMENT A. The Subject Parcel is currently in my possession, in Springfield, Missouri, which is within the Western District of Missouri. Based on my experience and on the facts set forth in this affidavit, I believe the Subject Parcel contains evidence of violations of Title 21, United States Code, Section 841(a)(1) (possession with intent to distribute a controlled substance); Title 21, United States Code, Section 843(b) (unlawful use of a communications facility to facilitate the distribution of a controlled substance); and/or Title 21, United States Code, Section 846 (conspiracy to distribute controlled substances).

4. Experience and drug trafficking intelligence information gathered by the USPIS have demonstrated that the USPS Express Mail and Priority Mail are frequently utilized by drug traffickers for shipping controlled substances or proceeds/payments. Use of Express Mail and Priority Mail are favored because of the speed (Express Mail- overnight, Priority Mail- two day delivery), reliability, free telephone and internet package tracking service, as well as the perceived minimal chance of detection. Express Mail was originally intended for urgent, business-to-business correspondence. Intelligence from prior packages, that were found to contain controlled substances or proceeds/payments, has indicated that these labels are usually from an individual to an individual.

- 5. Information gathered by the USPIS has also demonstrated that other delivery couriers, such as FedEx and United Parcel Service (UPS), are frequently utilized by drug traffickers for shipping controlled substances or proceeds/payments. Information gathered by the USPIS has demonstrated that the services and delivery practices of FedEx and UPS are similar to USPS Express Mail and Priority Mail. Like USPS Express Mail and Priority Mail, FedEx and United Parcel Service are used because of the speed, reliability, free telephone and internet tracking service, as well as the perceived minimal chance of detection. Like the USPS Express Mail and Priority Mail, FedEx and United Parcel Service were originally intended for urgent, business-to-business correspondence. However, intelligence from prior packages that were found to contain controlled substances or proceeds/payments has indicated that these shipping labels are usually from an individual to an individual.
- 6. In an effort to combat the flow of controlled substances through the overnight delivery services, interdiction programs have been established in areas throughout the United States by the USPIS. These areas have been identified as known sources of controlled substances. The USPIS conducted analysis of prior packages mailed via overnight delivery services that were found to contain controlled substances or proceeds/payments of controlled substance sales. The analysis of prior packages that were found to contain controlled substances or proceeds/payments, indicated that these labels are usually from an individual to an individual. In the few cases when overnight delivery packages containing controlled substances or proceeds/payments have displayed a business or company name, it has usually proven to be a fictitious business or company. Additionally, this analysis has established a series of characteristics which, when found in combination of two or more, have shown a high probability that the package will contain a controlled substance or the proceeds of

controlled substance sales. Information collected by the USPIS has demonstrated that the presence of these characteristics is significant for delivery services, to include USPS Express Mail and Priority Mail, FedEx, and UPS. This profile includes the following characteristics: package mailed from or addressed to a narcotic source area, package has a fictitious return address, package addressee name is unknown at the destination address, package sender name is unknown at the return address, package has address information that is handwritten, package is mailed from a Commercial Mail Receiving Agency (CMRA), package is addressed to residential areas, package is addressed from an individual to an individual, packages are wrapped in brown paper and/or heavily taped, and the ZIP Code from where the package was mailed is different than the ZIP Code used in the return address.

- 7. In my experience I have also found that the characteristics listed in the previous paragraphs are indicative of packages that have been found to contain illegal controlled substances or the proceeds/payments for controlled substances. I know that these payments are made using cash, gift cards, credit cards, wire transfers, money orders, and financial transactions. In my experience, it is not unusual for persons involved in sending illegal drugs through the mail or other commercial carrier services to send other drug related items like drug use paraphernalia in addition to payment, records, or other drug related communications.
- 8. On November 6, 2018, I was notified that the Subject Parcel was en route to 1001 North 23rd Avenue, Ozark, MO 65721, from California. I requested the processing plant intercept the Subject Parcel for me. On November 7, 2018, I was notified the Subject Parcel was being held for me at the Springfield, Missouri, Processing and Distribution Center. I responded to that location and picked up the Subject Parcel.

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- 9. I checked the return and delivery addresses shown on the Subject Parcel through a commonly used law enforcement database. I could find no record of anyone with the last name Bradford or Beadford associated to the return address. I also could not find anyone with the name Mikel or Mason associated to the delivery address.
- 10. On November 7, 2018, I contacted Springfield, Missouri, Police Department Detective Jason Copley and requested his canine check the Subject Parcel. Detective Copley and his canine "Rocky" responded to the Springfield Main Post Office where the Subject Parcel and two "sterile" parcels were presented to Rocky. Detective Copley advised Rocky indicated the odor of a controlled substance coming from the Subject Parcel and not the sterile parcels. Detective Copley advised Rocky is certified on the odors of methamphetamine, cocaine, marijuana, heroin, and ecstasy (MDMA). Rocky and Copley are certified as a "NPCA Narcotics Detector Dog Team" by the National Police Canine Association, after completing a six-week, 240-hour course of basic obedience and drug odor recognition. This is an annual certification that was last completed in October 2018. Rocky is trained as a passive indicator canine and indicates the presence of narcotic odors by sitting and staring at the source of narcotic odor.
- 11. Based on these facts, I believe there is probable cause to believe that the Subject Parcel contains evidence of violations of Title 21, United States Code, Section 841(a)(1) (possession with intent to distribute a controlled substance); Title 21, United States Code, Section 843(b) (unlawful

use of a communications facility to facilitate the distribution of a controlled substance); and/or Title 21, United States Code, Section 846 (conspiracy to distribute controlled substances), and request a search warrant be issued to search the Subject Parcel and seize the items listed in ATTACHMENT B.

Further your Affiant sayeth naught.

Matthew Murrow

United States Postal Inspector

Subscribed and sworn before me this

day of November 2018.

David P. Rush

United States Magistrate Judge